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October 14, 2016

BY ECF

The Honorable Loretta A. Preska
Chief United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

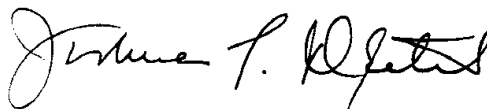
Re: United States v. Brian Coll,
15 Cr. 360 (LAP)

Dear Chief Judge Preska:

This letter is in regard to the above-entitled case, in which, along with Sam A. Schmidt, Esq., I have been appointed as counsel for defendant Brian Coll, and respectfully requests a brief extension of time in which the parties must submit Requests to Charge (“RTC’s”) to the Court. Currently, that submission is due today. I have been in contact with Assistant United States Attorney Brooke E. Cucinella, and she has informed me the government consents to this request.

While the parties have circulated proposed RTC’s, and conferred orally and in writing with respect to differences, and have resolved a number of them, defense counsel and the government continue to negotiate in order to reduce to as few as possible the issues the Court would need to decide. In addition, the parties are also completing and filing today their supplemental motions *in limine*. As a result, it is respectfully requested that the time for submission of the RTC’s be extended until Wednesday, October 19, 2016.

Respectfully submitted,



Joshua L. Dratel

JLD/

cc: Brooke E. Cucinella
Martin A. Bell
Jeannette Vargas
Assistant United States Attorneys